

THE HONORABLE Samuel J. Steiner
Chapter 11
Location: Bremerton
Date of Hearing: Ex-parte

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

IN RE:)
) **IN CHAPTER 11 NO.: 09-15727**
Carolyn Frame)
and Charles Frame,) **MOTION FOR ORDER TO USE POST-**
) **PETITION EARNINGS AND CASH**
) **COLLATERAL FOR THE PURPOSE**
) **OF CONTINUING BUSINESS**
) **ACTIVITIES**
Debtor.)

COMES NOW the debtor, **Carolyn Frame and Charles Frame**, by and through their attorney, DAVID CARL HILL, and moves this court for an Order granting them leave to **USE POST-PETITION COLLATERAL FOR THE PURPOSE OF CONTINUING BUSINESS ACTIVITIES AND PERSONAL ACTIVITIES.**

This Motion is made based upon the affidavit of DAVID CARL HILL, attached hereto and incorporated herein by this reference.

/s/David Carl Hill
DAVID CARL HILL, WSBA#9560
Attorney for Debtors

STATE OF WASHINGTON)
) ss.
COUNTY OF KITSAP)

DAVID CARL HILL, being first duly sworn on oath, deposes and states:

1 That I am the attorney for the debtor above named. Debtor requires the ability to pay
2 personal monthly expenses, and to continue business operations.

3 Based upon the foregoing, I respectfully request that the debtors be granted leave
4 to incur indebtedness for the purchase of a commercial van as set forth.

5 Respectfully submitted.

6
7 /s/David Carl Hill
8 DAVID CARL HILL

9 SUBSCRIBED AND SWORN to before me this 9th day of June, 2009

10 /s/Kevin M. Decker
11 NOTARY PUBLIC in and for the
12 State of Washington.
13 My commission expires: April 1, 2012
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